

Gary C. Moss, Bar No. 4340
moss@jacksonlewis.com
Paul T. Trimmer, Bar No. 9291
trimmerp@jacksonlewis.com
JACKSON LEWIS LLP
3960 Howard Hughes Parkway
Suite 450
Las Vegas, Nevada 89169
Tel: (702) 921-2460
Fax: (702) 921-2461

*Attorneys for Defendant
Medco Health LLC*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

NAMIT BHATNAGAR, an individual,

) Case No.: 2:11-cv-00914-PMP-LRL

V

MEDCO HEALTH, LLC, a foreign Limited Liability Company doing business in Nevada DOES I through X and ROES I through X,

**DEFENDANT MEDCO HEALTH
LLC'S MOTION TO EXTEND TIME
TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS'
COMPLAINT**

(First Request)

Defendants

Pursuant to LR 6-1, Defendant Medco Health LLC, ("Defendant") submits the following Motion to Extend Time to Answer or Otherwise Respond to Plaintiff Namit Bhatnagar's ("Plaintiff") Complaint. This motion is submitted and based on the following:

1. That this is the first request for an extension of time for Defendant to file its answer or otherwise respond to Plaintiff's Complaint.

2. That Defendant's answer to Plaintiff's Complaint is currently due on Monday, June 13, 2011.

3. Due to Defense Counsel's schedule, a short additional amount of time is necessary to review the Complaint and prepare a response.

4. Because Plaintiff is unrepresented, and in an abundance of caution, Defendant is filing this Motion rather than arranging for the extension via stipulation.

5. Accordingly, Defendant respectfully requests the Court to enter an order extending the time in which to answer or otherwise respond to Plaintiff's Complaint by **one week** to and including Monday, June 20, 2011.

6. That this request for an extension of time to file Defendant's answer or otherwise respond to Plaintiff's Complaint is made in good faith and not for the purpose of delay.

Dated this 13th day of June, 2011.

JACKSON LEWIS LLP

/s/ Paul T. Trimmer
Paul T. Trimmer
3960 Howard Hughes Parkway, Suite 450
Las Vegas, Nevada 89169
Attorneys for Defendant

IT IS SO ORDERED.

Judge, U.S. District Court

Dated: June 14, 2011

CERTIFICATE OF SERVICE

Pursuant to Special Order #109, counsel of record registered for the CM/ECF system have been served with the foregoing **MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** by electronic means. In addition, pursuant to Fed. R. Civ. P. 5(b), I hereby certify that the service of the same was made this day by depositing a true copy of the same for mailing at Las Vegas, Nevada, addressed to:

Namit Bhatnagar
273 Great Duke Avenue
Las Vegas, NV 89183

Dated this 13th day of June, 2011.

/s/ Rae J. Christakos
An employee of JACKSON LEWIS LLP